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DRAFT

~~Draft Communication Strategy~~Communication Plan for Deployment of Continuous Air Monitors in
LaPlace, LA (Nov. 18, 2019)

Objective:

Inform and educate community members, government officials and other stakeholders of the planned deployment by EPA's Office of Enforcement and Compliance Assurance (OECA) of a new continuous air monitoring program in LaPlace, Louisiana, near the Denka Performance Elastomers LLC (Denka) facility.

Issue Description:

EPA released its National Air Toxics Assessment in 2015, which showed that the five census tracts around the Denka facility in LaPlace, Louisiana had the highest cancer risk in the country. The Denka facility emits chloroprene, which EPA identified as a likely human carcinogen in 2010. Current

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current monitoring program is not continuous. EPA does not know how often these elevated concentration conditions are occurring. Because these elevated concentrations occur infrequently, they may be linked to infrequent (rather than routine) activities at the Denka facility that can be evaluated for opportunities to reduce emissions. EPA believes that identifying and addressing the causes of these elevated concentrations will lower the long-term average ambient air concentration of chloroprene near the Denka facility. EPA intends to implement a new air monitoring program at the facility to identify opportunities for additional chloroprene emission reductions by determining the cause of elevated ambient air concentrations of chloroprene.

Target Audience:

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Messengers:

- * Region 6 DRA David Gray (Primary EPA messenger to the community)
- * OECA Air Enforcement Division staff
- * Region 6 Air Enforcement staff
- * OAR/OAQPS (messages on public health/risk)

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Key Messages

- The current air monitoring program at the Denka facility shows occasional elevated concentrations of chloroprene. Because this air monitoring is not continuous, we don't know how often these elevated concentrations occur.
- The purpose of the new monitoring program is to help us identify when high chloroprene concentrations occur; investigate the factors contributing to those elevated concentrations; and identify opportunities to reduce the frequency and magnitude of elevated chloroprene concentrations.
- By finding opportunities to reduce the frequency and magnitude of elevated chloroprene concentrations, EPA hopes to reduce the long-term average chloroprene air levels in the vicinity of the Denka facility.

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Social Media and New Media Activities

- EPA Region 6 has established a [HYPERLINK "https://www.epa.gov/la/laplace-st-john-baptist-parish-louisiana"] with EPA monitoring information on the Denka facility. This plan endorses the continued use of this site as communities and other stakeholders are familiar with it and already use it. Further discussion is needed about the specific details of what information about the new monitoring program, and where on the website it will be located.
- Region 6 may make use of social media posts as an additional means to share public information on EPA monitoring activities.

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Outreach Activities

- Notification of Denka company of EPA's new monitoring plan
 - Justin Lannen and Providence Spina to initiate contact
- Notification of LDEQ of EPA new monitoring plan
 - David Gray provided notification to LDEQ (December 6, 2019)
- Letter to LaPlace community informing them of EPA's new monitoring plan
 - David Gray to hand deliver during community meeting
- EPA participation in LaPlace community meeting
 - David Gray to participate in community meeting
- Follow-up community technical meeting
- Press Release from Region 6 announcing new EPA monitoring plan

Internal Notifications

- OAOPS
- BCR

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12/21/19	Send EPA notification letter to LaPlace community	OECA/AEDRS (David Gray)
12/21/19	EPA presents new monitoring plan at LaPlace community meeting	DRA David Gray with support from OECA/AED
12/7/19	Develop FAQs for EPA website	OECA/AED

The communication strategy includes eight parts:

- (1) Overall themes
- (2) Points of contact
- (3) Community Outreach
- (4) Communication with LDEQ
- (5) Communication with Denka
- (6) Website
- (7) Talking Points/FAQs
- (8) Press Release

(1) Overall Themes

- Current monitoring data show the long-term average ambient air concentrations of chloroprene near the Denka facility is in the range of 0.5 – 1.5 µg/m³, depending upon the location of the monitor. This average would be lower but for occasional elevated concentrations that drive the

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- The purpose of this monitoring program is to identify opportunities for additional chloroprene emission reductions by determining the cause of elevated ambient air concentrations of chloroprene.

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(2) Points of Contact (to be determined)

- * For Community Communications: David Gray
- * For Technical Issues:
 - * OECA [Technical Contact: Dan Hoyt]
 - * Region 6 [Technical Contact: James Leathers]
- * QA/QPS
- [LDEQ?]

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(3) Community Outreach (additional elements to be determined)

- Community meetings. Meetings occur every other Tuesday. The next meeting is [Tuesday, December 17]. David Gray (R5 DRA) will be primary POC for communications with community leaders].
- Follow-up technical meeting with Wilma Subra/community members
- Press release
- [Other]

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(4) Communication with LDEQ

- Per LDEQ's suggestion, EPA will host monthly meetings/conference calls to share summary information (using an online platform if necessary) and discuss occurrence of sampling triggers and resulting canister data.
- EPA will not provide LDEQ with hard copies of the data unless specifically requested by LDEQ.

(5) Communication with Denka (additional elements to be determined)

- If Denka requests, CECA presents Presentation of EPA monitoring plan via conference call
- Offer to share collected data with Denka

(6) Website

- Content
 - Summary of monitoring program and FAQ responses
 - Chloroprene concentrations from canister samples

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- We will not post VOC monitoring results from the PIDs or ambient air concentrations from other compounds, but all monitoring and sampling data that we collect would have to be released in response to a FOIA request.
- The sampling results will be posted to the existing EPA Region 6 LaPlace webpage but will be posted separately from the Community Monitoring results. Because the SPod canister sampling and analytical protocols are the largely the same as the Community Monitoring protocols, the presentation of the SPod results will look very similar to how the community results currently appear.

(7) Talking Points (To Be Converted into FAQs)

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Overview of the Monitoring Program

- **Why is EPA changing the monitoring program? How is this different from the monitoring that was conducted to date?**

- The purpose of monitoring conducted since 2016 (“Community Monitoring”) has been to determine the long-term ambient air concentrations of chloroprene in LaPlace, Louisiana.
- Community Monitoring data over the past year, conducted by both EPA and Denka, has shown a steady decline in the average ambient air concentrations of chloroprene, and also a reduction in the frequency of air samples containing “elevated concentrations” of chloroprene. “Elevated concentrations” are chloroprene concentrations notably higher than the average chloroprene concentration of air samples taken in 2019. Over the last six months, the monitoring data has shown average ambient air concentrations of chloroprene between 0.5 and 1.5 ug/m³.

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- The purpose of the new monitoring program is to improve our ability to identify activities linked to high chloroprene concentrations, investigate the factors contributing to those elevated concentrations, and identify opportunities to reduce the frequency and magnitude of elevated chloroprene concentrations.

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- **What monitors will EPA use and how will the monitoring work?**

- EPA will place a monitoring instrument, called an “SPod,” at each of EPA’s existing monitoring sites. An SPod is a monitoring instrument that contains a meteorological station to continuously measure wind speeds and directions, and a photoionization detector (PID) to continuously measure total ambient air concentrations of volatile organic compounds (VOCs). Chloroprene is a VOC. The SPods will also have sampling canisters to collect air samples whenever the PID detects a total concentration of VOCs exceeds above a specified “trigger” level.
- PIDs have been widely used for many years across numerous industries to measure VOC concentrations. EPA’s SPods will use PIDs that have the capability of detecting chloroprene (along with other VOCs).
- PIDs can tell us how much *total* VOCs are in the air, but they cannot tell us how much of that total amount is chloroprene. So when the PID measures a predetermined ~~amount~~ concentration of total VOCs in the air (“the trigger level”), EPA will take a 24-hour air sample with a canister.
- The air sample will then be analyzed for chloroprene at a laboratory using the same EPA-approved standard method that is currently being used for the Community Monitoring. This is the same sample collection process and laboratory analytical procedures we have used since the inception of the EPA Community Monitoring campaign.

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- What happens if ~~the~~ canister sample shows an elevated chloroprene concentration?

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of the elevated chloroprene results. The elevated concentration could be the result of numerous factors, including both meteorological factors (e.g., wind speed), and activities at Denka's facility. The investigation may lead to the identification of opportunities for chloroprene emission reductions at the facility.

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- What level of chloroprene emissions is considered an "elevated concentration"? ~~Why isn't~~

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- Denka has already taken steps under an agreement with LDEQ to control many known sources of high chloroprene emissions. We believe the next step is to find unknown events and sources of high chloroprene emissions so that those emissions can be addressed. An elevated ambient air concentration of chloroprene is a good signal that a high emission event may have occurred. By investigating the circumstances around an elevated concentration, EPA believes those unknown sources of chloroprene emissions can be identified and addressed, leading to a reduction in long-term ambient air concentrations of chloroprene.
- Therefore, EPA is focusing on chloroprene concentrations high enough to signal the possibility of an infrequent or unusual event.

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- **At what concentration of VOCs will EPA take a canister sample?**
 - Upon initial deployment of the SPods, EPA will set an initial sampling “trigger level” of [##] VOCs, above which EPA will take a canister sample. Based on Community Monitoring data, EPA believes this threshold is low and will result in samples being collected even when chloroprene concentrations are not elevated. EPA will adjust the trigger level to avoid sampling (and the associated costs) when chloroprene concentrations are not elevated. By starting low, and gradually raising the trigger level, EPA can be sure that it is not setting the trigger at a level that would miss a sample during an elevated concentration event.
 - Setting an appropriate trigger level is also challenging because the VOC concentration “trigger level” is also challenging because it will be based on an average over minutes, but EPA’s investigation “action level” is based on a 24-hour average. Starting with a low threshold for taking air samples will allow EPA to collect data and adjust the threshold level to account for this discrepancy.
 - EPA will update the website with any changes to the threshold level.
- **Isn’t the 24-hour sample too long? How does that capture high spikes of chloroprene that only occur for a short period of time?**
 - A 24-hour sample has the dual benefits of providing a data set that is directly comparable to the Community Monitoring data, and also identifying sustained elevated concentrations that merit additional investigation.
 - A 24-hour sample will be taken whenever the PID measures VOC concentrations above the trigger level for a short period of time. Therefore, the SPod will take a sample even if the chloroprene emissions are high for less than 24 hours.
- **The Community Monitoring frequently shows ambient air concentrations of chloroprene above 0.2 µg/m³. Why isn’t EPA taking samples continuously?**
 - Continuous sampling of emissions outside of the facility during routine operations will not help identify additional opportunities for chloroprene emission reductions. The monitors are too far away to detect where the emissions are coming from, and the sampling data would not help Denka or EPA determine what part of the routine operations may be contributing to the chloroprene emissions. Therefore, the Continuous Monitoring new monitoring program will only take samples during elevated concentration events when the resulting data could help us identify the cause of the elevated emissions.
- **When will monitors be deployed?**
 - Target January 2020
- **Will EPA analyze the air samples for any other compounds?**
 - No. The purpose of the Continuous Monitoring is to identify emissions sources of chloroprene.
- **Will EPA continue Community Monitoring?**

- Yes, but only until the SPod monitors are fully operational. We expect the SPod monitors to be in place and fully operational by April 2020, at which time the community monitoring will stop.

Public Information/Website

- **What data will be posted on the website and how frequently?**
 - Following analysis and quality assurance procedures at the laboratory, EPA will post the concentrations of chloroprene from any air canister samples.
 - Data will be posted only after a canister sample is taken and analyzed. Data may not be posted until several weeks after the sample is taken due to the analysis and quality

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- **Will the data from the Community Monitoring and the new monitoring program be different?**
 - Both the Community Monitoring and the new monitoring program measure 24-hour average ambient air concentrations of chloroprene, but the two monitoring programs will result in different data because they take air canister samples at different times.

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The Community Monitoring takes air samples every six days, regardless of the concentration of VOCs or chloroprene in the ambient air. Therefore, the Community Monitoring data shows chloroprene concentrations above 5 µg/m³ but also concentrations too low to be detected by the monitoring instruments.

- The new monitoring program, however, will only collect air samples when the SPod PIDs detect high concentrations of VOCs. Therefore, data from the new monitoring program are more likely to show higher concentrations of chloroprene, and less likely to show low or undetectable levels of chloroprene.

Figure 1

- The differences in the monitoring data do not mean that the data generated under either program is incorrect.

Post-Monitoring Actions

- **If the air samples from the new monitoring program show elevated chloroprene concentrations, how will EPA know where the chloroprene is coming from?**
 - Because the Denka facility is the only local facility that uses chloroprene, any chloroprene emissions can be attributed to the Denka facility.
- **If the new monitoring program shows elevated levels of chloroprene, or the investigation into the elevated levels of chloroprene reveal violations, will EPA take an enforcement action?**
 - 0.2 µg/m³ is not a federally enforceable emissions limit for chloroprene. But EPA and LDEQ will coordinate to address any issues discovered as a result of the new monitoring program. The ultimate goal of the program is to find opportunities to reduce the

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- Is EPA taking enforcement action against Denka and DuPont?
 - EPA identified several potential violations and areas of concern in a 2016 inspection of the Denka facility.

Public Health

- What are you doing to get ambient air concentrations of chloroprene below 0.2 µg/m³? Why is it acceptable for this community to continue being exposed at levels above this threshold?
 - 0.2 µg/m³ is not a federally enforceable emissions limit for chloroprene. But EPA recognizes the public health concern associated with the long-term exposure to

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- What will the data tell us about health risks to the community?
 - The data from the new Continuous Monitoring program is not appropriate for determining health risks from long term exposure to chloroprene because it is only measuring chloroprene concentrations during elevated concentration events.
 - The Community Monitoring program is designed to provide information about the long-term ambient air concentrations of, and exposure to, chloroprene, from EPA's scientists

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- But the new monitoring program will provide additional useful data for any public health or risk analysis.

(8) Press/Media

Draft Press Release for Deployment of Monitors in LaPlace, Louisiana

The U.S. Environmental Protection Agency (EPA) is continuing its investigation of chloroprene levels in LaPlace, Louisiana, by installing six new air pollution monitors. The monitors, which will be placed in the same locations as the air pollution monitors that EPA deployed in 2016, will run continuously and will produce data to identify high ambient air concentrations of chloroprene above baseline levels. The information generated by these monitors will help EPA and the Louisiana Department of Environmental Quality identify factors that contribute to high levels of chloroprene in the area.

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EPA began monitoring ambient air concentrations of chloroprene in May 2016 and continues to take air samples from six locations once every six days. Although recent monitoring data shows lower 24-hour average chloroprene concentrations compared to the data from 2016, the data also continues to show fluctuating chloroprene concentrations and “spikes” of chloroprene concentrations that are notably higher than the other data points. Because the current monitoring program collects data only every six days, the factors corresponding to higher or lower chloroprene levels are difficult to identify.

The new air pollution monitors will continuously monitor ambient air concentrations of air pollutants. If a monitor detects a high concentration of air pollutants, it will take a 24-hour air sample that will be analyzed in a laboratory to determine the amount of chloroprene in the air during the sampling period. By continuously monitoring air pollution concentrations and identifying the days that chloroprene concentrations are high, EPA and LDEQ will be better able to understand the events and conditions that contribute to higher levels of chloroprene.

To keep the public informed, ambient air concentrations of chloroprene from air samples collected by the monitors will be posted on EPA’s website.

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